

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION

Dominique B. Lovejoy

Plaintiff,

vs.

Jason L. Richardson, Rocket
Expediting, LLC, Super Ego Holdings,
LLC, Super Ego Logistics, LLC, Stefan
Perovic, and Logistics, LLC, Stefan
Perovic, and Sendmee Trucking, LLC

Defendants,

3:23-CV-05393-MGL

**GEICO'S AMENDED ANSWERS
TO LOCAL RULE 26.01
INTERROGATORIES**

Underinsured Motorist Carrier, GEICO, by and through its undersigned attorneys, hereby answers Local Civil Rule 26.01 Interrogatories as follows:

(A) State the full name, address and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

ANSWER: None known.

(B) As to each claim, state whether it should be tried jury or nonjury and why.

ANSWER: This case should be tried by a jury due to the factual issues present in the case and due to issues regarding damages present in the case.

(C) State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

ANSWER: GEICO is not a publicly owned company. GEICO is a wholly owned subsidiary of Berkshire Hathaway.

(D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division). See Local Civil Rule 3.01.

ANSWER: This action was originally filed in the Richland County Court of Common Pleas in Richland County in the State of South Carolina which is located within the Columbia Division of the United State District Court for the District of South Carolina.

(E) Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which *may be* related regardless of whether they are still pending. Whether cases *are* related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transactions, happenings or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

ANSWER: Xavier Hannibal, George Dalton, and Pamela Dalton v. Rocket Expediting, LLC, Super Ego Holdings, LLC, Super Ego Logistics, LLC, Stefan Perovic, Jason Richardson, and Sendmee Trucking, LLC, case no. 3:23-cv-02702-MGL, currently pending in the Columbia Division, arises from the same motor vehicle accident and involves the same Defendants.

(F) [Defendants only] If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

ANSWER: Not applicable.

(G) [Defendants only.] If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of said liability.

ANSWER: Not applicable.

(H) *Parties or Intervenorors in a Diversity Case.* In an action in which jurisdiction is based on diversity under 28 U.S.C. § 1332(a), a party or intervenor must, unless the court orders otherwise, name – and identify the citizenship of – every individual or entity whose citizenship is attributed to that party or intervenor. This response must be supplemented when any later event occurs that could affect the court’s jurisdiction under § 1332(a).

ANSWER: Upon information and belief, Defendant Richardson is a citizen and resident of Alabama;

Defendant Sendmee Trucking, LLC is a Limited Liability Company organized under the laws of the State of Alabama with its principal place of business in Alabama; Additionally, upon information and believe, all members of the LLC are residents of the state of Alabama.

Defendant Rocket Expediting, LLC is a Limited Liability Company organized under the laws of the State of Ohio with its principal place of business in Ohio; Additionally, upon information and believe, all members of the LLC are residents of the state of Ohio.

Defendant Super Ego Holdings, LLC is a Limited Liability Company organized under the laws of the State of Illinois with its principal place of business in Illinois; Additionally, upon information and believe, all members of the LLC are residents of the state of Illinois.

Defendant Super Ego Logistics, LLC is a Limited Liability Company organized under the laws of the State of Illinois with its principal place of business in Illinois; Additionally, upon information and believe, all members of the LLC are residents of the state of Illinois.

Defendant Stefan Perovic is a citizen and resident of the State of Illinois; and

The underinsured motorist carrier GEICO is an insurance company that sells and maintains insurance policies in the state of South Carolina among other states. Its corporate headquarters is located in Maryland. This party has is the potential underinsured motorist carrier and can provide no further information at this time regarding factual allegations allowing for diversity jurisdiction.

s/ Julie C. Hunter
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